

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

KIMORA WASHINGTON, as)	
administrator of the Estate of)	
KEVIN FORD,)	CIVIL ACTION FILE
)	4:24-CV-00081-CDL
Plaintiff,)	
)	
v.)	
)	JURY TRIAL DEMANDED
GWR MANAGEMENT, LLC AND)	
GWR FLAT ROCK PARTNERS,)	
LLC,)	
)	
Defendants.)	

**DEFENDANTS' EMERGENCY MOTION FOR PROTECTIVE ORDER
AND TO QUASH PLAINTIFF'S SUBPOENA TO COMPLETE STORAGE
SOLUTIONS, LLC**

COME NOW GWR MANAGEMENT, LLC and GWR FLAT ROCK PARTNERS, LLC ("Defendants"), and pursuant to Federal Rules of Civil Procedure 26(c) and 45(d) hereby file their Emergency Motion for Protective Order and Motion to Quash Plaintiff's Subpoena to Complete Storage Solutions, LLC. In support of this Motion, Defendants rely upon the following:

- Defendants' Memorandum of Law in Support of Emergency Motion for Protective Order and to Quash Plaintiff's Subpoena to Complete Storage Solutions, LLC;
- Declaration of Robert J. Kozloski, III, Esq.;

- Declaration of Frederick O. Ferrand, Esq.;
- All pleadings and papers filed with this Court.

WHEREFORE Defendants request that this Court grant their Motion and enter an order in accordance therewith.

This 10th day of February, 2025.

SWIFT CURRIE MCGHEE & HIERS, LLP

/s/ Robert J. Kozloski, III

Frederick O. Ferrand

Georgia Bar No. 259169

Robert J. Kozloski, III

Georgia Bar No. 548519

Attorneys for Defendants

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CERTIFICATE OF CONFERENCE

Pursuant to Fed. R. Civ. P. 26(c)(1), this is to certify that undersigned counsel attempted in good faith to resolve the discovery dispute that is the subject of this Motion on January 31, 2025. Unfortunately, the parties were unable to reach an amicable resolution.

This 10th day of February, 2025.

SWIFT CURRIE MCGHEE & HIERS, LLP

/s/ Robert J. Kozloski, III

Frederick O. Ferrand

Georgia Bar No. 259169

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing **DEFENDANTS' EMERGENCY MOTION FOR PROTECTIVE ORDER AND TO QUASH PLAINTIFF'S SUBPOENA TO COMPLETE STORAGE SOLUTIONS, LLC** with the Clerk of Court, by e-filing same using the CM/ECF Filing System, which will automatically send e-mail notification of said filing to the following attorneys of record:

William Maxwell Compton, Esq.
Morgan & Morgan
200 Stephenson Ave, Suite 200
Savannah, Georgia 31405
mcompton@forthepeople.com

This 10th day of February, 2025.

SWIFT CURRIE MCGHEE & HIERS, LLP

/s/ Robert J. Kozloski, III

Robert J. Kozloski, III
Georgia Bar No. 548519
Attorney for Defendants

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